

Mr. John Wingard  
Accra Pac Group, Inc.  
P. O. Box 878  
Elkhart, Indiana 46515

Re: 039-14131-00434  
First Administrative Amendment to  
Part 70 039-6875-00434

Dear Mr. Wingard:

Accra Pac Group, Inc., located at 2730 Middlebury Street, Elkhart, Indiana 46515, was issued a Part 70 permit on February 9, 2001 for a liquid and aerosol can filling operation. A typographical error has been noted in the permit. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended:

1. Condition D.1.6(a) on Page 31 of 41 of the Part 70 permit will be revised to correct the typographical error and to further clarify this Condition without changing its intent or application it will be revised as follows (changes are bolded and deletions are struck-through for emphasis):

**D.1.6 PSD BACT Determination [326 IAC 2-2, and 40 CFR 52.21]**

---

Pursuant to 326 IAC 2-2, and 40 CFR 52.21, the BACT determined for this liquid and aerosol can filling plant shall be the following:

- (a) The ~~pounds~~ **gallons** of VOC compounded and filled into containers per month; ~~the number of cans filled with including the VOC propellant filled into containers per month; and the number of cans filled with VOC that were crushed per month; the number of can crushed that were filled with VOC; the cubic feet of natural gas used per month~~ shall be limited such that the summation of the emissions calculated using the equation below shall not exceed a VOC emissions limit of 440 tons per twelve-month period, rolled on a monthly basis.

VOC Emission = [(~~lbs.~~ **gallons** VOC compounded & filled/month x Ef, 0.03 lbVOC/gal VOC) + (# cans filled with VOC **propellant**/month x Ef, 0.0013 lb VOC/can) + ( # cans **with VOC** crushed/**month** ~~filled with VOC~~ x Ef, 0.011 lb VOC/can)]

2. The equation in the Report Form on Page 36 of 41 of the permit will also be revised to reflect the above corrected equation.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Kakiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PSD PERMIT and PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Accra Pac Group, Inc.  
2730 Middlebury Street  
Elkhart, Indiana 46515**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-2 and 40 CFR 52.21 (Regulations for Prevention of Significant Deterioration of air quality); and 40 CFR 124 (Procedure for Decision Making), with conditions listed on the attached pages.

This permit is also issued in accordance with 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|   |                                 |
|---|---------------------------------|
| PSD and Part 70 Operation Permit No.:<br>039-6875-00434                           |                                 |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: February 9, 2001 |
| 1 <sup>ST</sup> Administrative Amendment 039-14131-00434                          | Pages Affected 31, 36,          |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office Air Quality                 | Issuance Date: March 29, 2001   |

## GENERAL CONSTRUCTION CONDITIONS

### D.1.1 Permit No Defense [IC 13]

---

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### D.1.2 Definitions [326 IAC 2-7-1]

---

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

## Effective Date of the Permit

- D.1.3 Pursuant to 40 CFR Parts 124.15 124.19 and 124.20, the effective date of this permit will be thirty-three (33) days from its issuance.
- D.1.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

## Operation Conditions

## Emissions Limitation and Standards

### D.1.5 BACT Minor Limitation [326 IAC 8-1-6]

---

The number of cans crushed that were filled with VOC shall be limited to less than 4,545,000 per twelve-month period, rolled on a monthly basis. Based on the emission factor, Ef of 0.011 pounds of VOC per can crushed shall result in VOC emissions less than 25 tons per twelve month period. Compliance with this condition will make 326 IAC 8-1-6 not applicable (General Reduction Requirements).

### D.1.6 PSD BACT Determination [326 IAC 2-2, and 40 CFR 52.21]

---

Pursuant to 326 IAC 2-2, and 40 CFR 52.21, the BACT determined for this liquid and aerosol can filling plant shall be the following:

- (a) The gallons of VOC compounded and filled into containers per month; the number of cans filled with VOC propellant per month; and the number of cans filled with VOC that were crushed per month; shall be limited such that the summation of the emissions calculated using the equation below shall not exceed a VOC emissions limit of 440 tons per twelve-month period, rolled on a monthly basis.

$$\text{VOC Emission} = [(\text{gallons VOC compounded \& filled/month} \times \text{Ef, 0.03 lbVOC/gal VOC}) + (\text{\# cans filled with VOC propellant/month} \times \text{Ef, 0.0013 lb VOC/can}) + (\text{\# cans with VOC crushed/month} \times \text{Ef, 0.011 lb VOC/can})]$$

- (b) Pressure filling or through the valve filling method shall be utilized at all times when the product being filled allows for this method.
- (c) When pressure filling can not be utilized, Under the Cup (UTC) fill method with vapor reclaim or the use of equivalent means of emission reduction shall be utilized.
- (d) Continue enclosure of open bowl liquid filling reservoirs, wherever possible.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**COMPLIANCE DATA SECTION**

**Quarterly Report**

Source Name: Accra Group, Inc.  
Source Address: 2730 Middlebury Street, Elkhart, Indiana 46515  
Mailing Address: P. O. Box 878, Elkhart, Indiana 46515  
PSD and Part 70 Permit No.: 039-6875-00127  
Facility: Sourcewide  
Pollutant: VOC  
Limit: 440 tons of VOC emissions per 12-month period, based on a monthly rolling. This (VOC) emission limitation shall be determined using the following emission factors:

| Facility/Operation          | VOC Emission Factor      |
|-----------------------------|--------------------------|
| VOL Compounding and Filling | 0.03 lb VOC/gal VOC      |
| Propellant Filling          | 0.0013 lb VOC/can filled |

**Year:** \_\_\_\_\_

| Operations     | VOC Propellant Filling |                      | VOL Compounding and Filling      |                      |
|----------------|------------------------|----------------------|----------------------------------|----------------------|
|                | No. of cans Filled     | VOC Emissions (Tons) | MM gal VOC Compounded and Filled | VOC Emissions (Tons) |
| This Month     |                        |                      |                                  |                      |
| Past 12 Months |                        |                      |                                  |                      |

Sourcewide VOC emissions shall be determined using the following equation:

$$\text{VOC Emission} = [(\text{gallons VOC compounded \& filled/month} \times \text{Ef, 0.03 lbVOC/gal VOC}) + (\# \text{ cans filled with VOC propellant/month} \times \text{Ef, 0.0013 lb VOC/can}) + (\# \text{ cans with VOC crushed/month} \times \text{Ef, 0.011 lb VOC/can})]$$

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.